

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	CR No.: 04-10098-WGY
)	
)	
)	
v.)	
)	
)	
)	
CARMEN FIGUEROA,)	
<i>Defendant</i>)	

EMERGENCY MOTION TO CONTINUE SENTENCING

NOW COMES, Carmen Figueroa, the Defendant in the above-captioned matter and moves through Counsel to continue her sentencing hearing from Tuesday, June 13, 2006 to Wednesday, July 12, 2006; and / or another date convenient to this Court.

In support of this motion, counsel for the defendant states as follows:

1. Counsel has not been able to adequately prepare a a sentencing memorandum to advance both downward departure issues and statutory sentencing concerns.
2. The reason counsel has not been able to complete the requests for downward departure and the crucial sentencing memorandum is that he has had to try three (3) murder cases and a federal loan sharking case within the span of five (5) months and has been drafting a first circuit brief which he is being pressed to complete.
3. The additional time is in the interest of justice.

Counsel has spoken with the Assistant United States Attorney assigned to this case and the government takes no position with respect to this motion.

Respectfully submitted,
CARMEN FIGUEROA
By her Attorney;

Dated: June 7, 2006

/s/ John LaChance
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CERTIFICATE OF SERVICE

I, John H. LaChance, Esq., do hereby certify that I have served a copy of the foregoing upon the government by means of the CMECF System upon Assistant United States Attorney Susan Postwistillo located at the Office of the District Attorney, One Courthouse Way, Suite 9200, Boston, MA 02110 on this 7th day of June, 2006.

/s/ John LaChance
John LaChance, Esquire